
COMPLIANCE INFORMATION REQUEST

1. AN EXECUTIVE OFFICER OF THE FINANCIAL INSTITUTION SHOULD BE RESPONSIBLE FOR THE CONTENT AND ACCURACY OF THE ANSWERS PROVIDED ON THIS FORM.
2. WHERE SPACE IS INADEQUATE, AN ATTACHED BLANK SHEET REFERENCING THE PARTICULAR QUESTION(S) MAY BE USED TO RESPOND.
3. IF ANY QUESTION IS NOT APPLICABLE TO YOUR INSTITUTION, PLEASE INDICATE AS "NOT APPLICABLE" OR "N/A". UNLESS OTHERWISE INDICATED, ALL QUESTIONS AND REQUESTS CONCERN ONLY THAT PERIOD OF TIME SINCE THE LAST FDIC COMPLIANCE EXAMINATION, OR SINCE CONVERTING TO STATE NON-MEMBER STATUS OR SINCE THE BANK OPENED FOR BUSINESS (as applicable).

LOCATIONS NEED ONLY BE PROVIDED IF REQUESTED INFORMATION IS LOCATED ON A SEPARATE FLOOR OR AT ANOTHER PHYSICAL LOCATION.

General

1. *SEND* a current list of all offices, identified by:
 - Branch name
 - Street address
 - City
 - State
 - Zip code
2. *SEND* a current list of the financial institution's directors/trustees and officers, identified by name and title.
3. Provide the name and location of the individual who can provide access to the Board of Directors/Trustees and board appointed committee minutes.
4. Provide the name and location of the individual who can provide access to the daily statement of assets and liabilities.
5. Provide the name(s) and location(s) of the individual(s) who can provide access to any written compliance program(s), procedure(s), or manual(s).

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6. Provide the name and location of the individual who can provide:
- (1) A copy of the financial institution's advertising budget
 - (2) Access to the bank's advertising file, including:
 - Newspaper advertisements
 - Radio or TV scripts
 - Lobby brochures
 - Statement stuffers
 - Internet advertisements
 - Other forms of advertising
-
7. Provide the name and location of the individual who can provide a copy of your institution's written advertising policy, if applicable.
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8. Provide the name and location of the individual who can provide access to copies of any consumer or civil rights complaints and your institution's response(s).
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9. Describe any significant changes made since the prior examination (or scheduled to occur within the next quarter) with respect to the financial institution's:
- Compliance program
 - Senior management
 - Compliance personnel
 - Loan disclosure software
-
10. Is the institution presently a party in any lawsuit alleging credit discrimination or other violation of consumer law? If yes, provide:
- The name(s) of the plaintiff(s)
 - Amount(s) sought
 - Nature or basis of the allegation
 - Current status

Truth in Lending

- | | | |
|--------------|--|----------------|
| Passbook | Purchase Real Estate (RE) | Junior Lien RE |
| Construction | Other Consumer Loans (auto, personal, student, etc.) | |

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5. Mark with an "X" each feature/charge applicable to the institution's consumer loans:

_____ Variable Rates	_____ Discounted Variable Rates	_____ Balloon Payments
_____ Single Payment	_____ Constant Payments to Principal	_____ Odd-Days Interest
_____ Private Mortgage Insurance	_____ Real Estate "Points"	_____ Inspection Fees on Construction Loans
_____ Reverse Equity RE	_____ Simple Interest (360/365)	_____ Precomputed Interest
_____ Irregular Advances	_____ Graduated Payments	_____ Interest Only with Principal Balloon
_____ Application Fees which are Refunded if a Loan is Denied	_____ Vendor's Single Interest Insurance	_____ Filing Fees
_____ Credit Life Insurance	_____ Credit Disability Insurance	_____ Other Loan Fees

6. List the location of each type of loan file and the individual to contact to obtain loan files. (Please utilize the comment section to specify if more than one file exists for each loan in the institution - i.e. document file, collateral file, credit file, correspondence file, etc.)

Type of Loan:	Name:	Location:
_____	_____	_____
Type of Loan:	Name:	Location:
_____	_____	_____
Type of Loan:	Name:	Location:
_____	_____	_____
Type of Loan:	Name:	Location:
_____	_____	_____

Comments:

COMPLIANCE INFORMATION REQUEST

Consumer Leasing

1. Has the institution made or purchased any consumer leases? If yes, please list the name and location of the individual who can provide access to a copy of the most recent trial balance for consumer leases.

Real Estate Settlement Procedures

1. Has the institution charged any fees for making application, checking credit history, appraising or inspecting collateral, or for any other type of real estate settlement service, including loan commitment fees, in connection with the granting of mortgage credit? If yes, provide details.
2. Has the institution required the use of a particular provider (attorney, law firm, title company, real estate broker, real estate appraiser, or others) of a settlement service and required the borrower to pay any portion of the cost of such service? If yes, supply:
 - Provider(s) names
 - Types of services rendered
 - Amount of customary charges imposed
3. Has the institution given or accepted any fee, payment, advance, loan, service, discount, rebate or other consideration to or from any settlement service provider with whom the institution does business in connection with real estate mortgage lending? If yes, provide details.
4. Is the institution involved in a "Affiliated business arrangement" as defined in Section 3(7) of the Real Estate Settlement Procedures Act? If yes, provide details.
5. Describe the specific items included in the financial institution's escrow accounts for "federally related mortgage loans" as defined in Section 3500.2 of the Real Estate Settlement Procedures regulation.
6. Does the institution provide to each person, who applies for a mortgage servicing loan as defined in Section 3500.21(a), a disclosure pertaining to the assignment, sale, or transfer of loan servicing (mortgage servicing transfer disclosure)?

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Flood Insurance

1. Describe the procedures used to determine whether improved real estate or a mobile home securing a loan is located in a special flood hazard area.
2. Does the institution have procedures in place to ensure that improved property or a mobile home securing a loan located in a special flood hazard area is covered for the entire term of the loan by flood insurance? If yes, provide details.
3.
 - (A) Provide the name(s) and location(s) of the individual(s) who can provide access to copies of any flood maps use for making flood determinations.
 - (B) Provide the name and address of any third party providing flood determination services for the bank.
 - (C) How much is the initial fee for third party flood determination services?
 - (D) What portion of this fee is life of loan versus initial determination?

Truth in Savings

1. List and describe the types of deposit accounts offered to consumers and identify any new products introduced since the last examination.
2. Has the institution offered merchandise as a bonus or premium for certain deposits? If yes, provide details.
3. Provide the name and location of the individual who can provide access to copies of any written policies, procedures, practices and training materials (inclusive of schedules) relating to Truth in Savings.
4. Does the institution use the collected balance or the ledger balance method to accrue interest?

COMPLIANCE INFORMATION REQUEST

Interest on Deposits

1. Does the institution have procedures designed to monitor excessive activity in Money Market Accounts? If yes, provide details.
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2. Provide the name and location of the individual who can provide access to a copy of the most recent trial balance for all NOW accounts including full names, account numbers and balances. Does the institution have procedures to monitor eligibility for NOW accounts? If yes, provide details.
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Fair Debt Collection Practices

1. Has the institution performed collection services for any defaulted consumer debts owed to third parties? If yes, provide details.
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Preservation of Consumer's Claims and Defenses

1. Has the institution purchased consumer loans and/or leases from merchants, dealers or other third-party sources? If yes, list the types of loans and/or leases and the names of third party sources.
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2. Have any customers been referred by a dealer or merchant for a loan, the proceeds of which were used to purchase goods or services from that dealer or merchant? If yes, list the name(s) of dealer(s) or merchant(s).
-

Electronic Fund Transfer

1. List all electronic fund transfer services performed by the institution, including, but not limited to:
 - Direct deposit (including Social Security transfers)
 - Preauthorized withdrawal of funds
 - Automated teller machine transfers
 - Point-of-sale terminal transfers
 - Transfers initiated by telephone
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2. Provide the name and location of the individual who can provide access to any error dispute files.
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Expedited Funds Availability

1. Does the institution place holds on deposit accounts? If yes, what type of deposit holds are placed and approximately how many of each type are placed on a yearly basis?
-

Equal Credit Opportunity

1. Describe the procedures currently followed when the institution takes adverse action on a verbal or written credit application submitted by:
- Consumers
 - Businesses with gross revenues of \$1 million or less
 - Businesses with gross revenues of more than \$1 million
-
2. How does the institution maintain credit information on married customers?
-
3. Under what circumstances does the institution require a husband or wife to guarantee or co-sign a loan to his or her spouse?
-
4. If a dealer or merchant requests credit from the institution for a customer and adverse action is taken on the application, what type of notification is given to the applicant by either the institution or dealer/ merchant?
-
5. Describe the procedures followed by the institution to provide an applicant with a copy of an appraisal report used in connection with an application for credit that is to be secured by a lien on a dwelling.
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6. Provide the name(s) and location(s) of the individual(s) who can provide access to copies of any written loan policies.
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7. Provide the name and location of the individual who can provide access to a copy of the institution's appraisal policy.
-
8. Provide the name(s) and location(s) of the individual(s) who can provide access to documentation concerning loan denials and withdrawals for all consumer and business loan applicants during the last 25 months and 12 months, respectively.
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Home Mortgage Disclosure

1. Did the institution have assets of more than \$30 million on the preceding December 31 and have a home or a branch office in a metropolitan statistical area or a primary metropolitan statistical area? If yes, has the institution received applications for, or originated or purchased, home purchase loans (including refinancings) and/or home improvement loans?
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2. Provide the name and location of the individual who can provide access to any set of census tract maps used by the institution and any source that the bank may use to convert a street address to a census tract.
-
3. *SEND* a copy(ies) of the Loan Application Register(s) (LAR(s)) for . The Examiner-in-Charge may also contact the bank to request this information electronically.
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4. *SEND* documentation relating to any revisions made to the last three HMDA LARs after their initial filing with the Federal Reserve Board.
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Fair Lending

1. Does the financial institution use an internal secondary review system for all, or some, credit applications? If yes, provide details.
2. Is fair lending training provided to directors, officers, and bank employees? If yes, provide details.
3. Does the financial institution perform any internal audits/reviews for fair lending? If yes, please describe the scope.

Community Reinvestment Act

1. Provide the name and location of the individual who can provide access to copies of any CRA self-assessment(s) performed by the institution or other outside organization. Provide a brief description of each assessment included in the scope of the self-assessment.
2. *SEND* a description of your assessment area(s). If the assessment area(s) consist of less than whole political subdivision, send a description of how the assessment area was determined.
3. *SEND* a list of all census tracts and block numbering areas located within your assessment area(s).
4. Provide the name and location of the individual who can provide access to the public comments file.
5. Provide the name and location of the individual who can provide access to any documentation concerning community development activities that are funded by the institution.

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6. Provide information on any specific efforts by your institution to respond to lending, investment and service opportunities in your assessment area that is produced in the normal course of business. Sources of such information may include, but are not limited to:
- Information about lending, investment, and service opportunities in your institution's assessment area(s) either developed by your institution or obtained from community organizations, state, local and tribal governments, economic development agencies, or other sources
 - The institution's business plan, strategic plan and annual report
 - Product assessment reports
 - Economic and demographic analyses
 - Customer surveys aimed at identifying product and service needs
 - Reports on participation in government insured, guaranteed or subsidized loan programs
 - Information relevant to your institution's ability to meet community credit needs based on:
 - financial condition and size
 - statutory authority/legal restrictions
 - other factors

Privacy of Consumer Financial Information

1. Provide the name and location of the individual responsible for the administration of the institution's privacy policies and procedures.
2. Has the institution issued opt-out notices to consumers? If yes, provide details.
3. Does the institution disclose nonpublic personal information about consumers to nonaffiliated third parties to market the institution's own products or services, or market financial products or services offered pursuant to joint marketing agreements between the institution and another financial institution? If yes, provide details.

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4. Does the institution receive nonpublic personal information about consumers from nonaffiliated financial institutions? If yes, provide details.
5. Does the institution disclose, directly or through affiliates, account numbers or similar access numbers or codes for consumers' credit card accounts, deposit accounts, or transaction accounts with nonaffiliated third parties (other than a consumer reporting agency) for use in marketing? If yes, provide details.

Children's Online Privacy Protection

1. Does the institution operate an Internet Web site or online service directed to children that collects or maintains personal information about them? If yes, provide details.
2. Does the institution operate a general audience Internet Web site or online service that collects or maintains personal information from children online? If yes, provide details.
3. Respond to the following question if you answered yes to either question 1 or 2: Does the institution participate in an FTC-approved, self-regulatory program? If yes, provide details.

Right to Financial Privacy

1. Has the institution provided any *Federal* government authority access to the financial records of a customer? If yes, please provide the name and location of the individual who can provide access to any files relating to the release of this information.

Fair Credit Reporting

1. Does the institution procure consumer reports? If yes, briefly describe the purposes for which reports are obtained, for example: in response to applications for credit, insurance, and employment, etc.
2. Provide the names and addresses of all consumer reporting agencies to which consumer information is routinely provided and the frequency of the transmission. Please list the types of accounts and/or products that are reported.
3. Has the institution obtained and/or used any prescreened lists of consumers to offer unsolicited credit or insurance products? If so, please indicate the product type(s) and the date(s) that the lists were obtained and the unsolicited offers were made.

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Electronic Banking - Mark all that apply with an "X"

Delivery Channels:

☐ Internet ☐ PC Banking (Dial-Up) ☐ Phone Banking
☐ Automated Loan Machines ☐ Electronic Money Products

Online Activities Conducted (via Internet or PC Banking):

Informational Content (including advertisements, rate displays, lists of services, etc.)

☐ Deposit-Related
☐ Lending-Related
☐ Non-deposit Investment Products

Information Exchange and Transactional Functions

Deposit-Related

☐ Disclosures Online ☐ Account Application ☐ Transfer Funds
☐ Review Account Statement ☐ Bill Payment Services

Lending-Related

☐ Disclosures Online ☐ Credit Application ☐ Transfer Funds
☐ Review Account Statement ☐ Bill Payment from Credit Line

Non-deposit Investment Products

☐ Disclosures Online ☐ Account Application ☐ Transfer Funds
☐ Review Account Statement

Electronic Mail

☐ Transmit Disclosures ☐ Accept Customer Inquiries/Complaints

Bank's World Wide Web site address and Electronic Banking Contact:

The following should be available for examiner review (as applicable):

☐ User guides and agreements
☐ Compliance reviews
☐ Bank audit reports (internal and external)

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Does the bank have plans for expanding any electronic banking activities, programs, or capabilities in the near future? If so, please provide details.

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MAKE ANY ADDITIONAL COMMENTS IN THE FOLLOWING AREA. IF RESPONDING TO A SPECIFIC QUESTION, IDENTIFY SECTION HEADING AND QUESTION NUMBER. COPY THIS FORM, IF ADDITIONAL SPACE IS NECESSARY.

Name and title of Executive Officer responsible for content and information provided.	Name of Financial Institution
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